

EXHIBIT B

CMO #4	2/11/10 Interrogatories
III.B.2.(a) (i) Defendants in each focus case will identify jobbers supplied by them that provide gasoline containing MTBE to the Relevant Geographic Area.	Interrogatory #3 Identify all jobbers, resellers, carriers, distributors, and retailers supplied by you that provide or provided gasoline containing MTBE to the Commonwealth of Puerto Rico
III.B.2.(a) (ii) Manufacturers of neat MTBE and/or TBA will disclose how and where it is made.	Interrogatory #4 Have you ever manufactured neat MTBE and/or TBA? If so, disclose where and when it was manufactured, and identify each refiner to whom you have sold or delivered neat MTBE and/or TBA that may have been added to gasoline for delivery in the Commonwealth of Puerto Rico.
III.B.2.(a) (iii) Manufacturers of neat MTBE and/or TBA will identify each refiner to whom it has sold or delivered neat MTBE and/or TBA, during the relevant time period for each focus case listed in subparagraph (a) above, that may have been added to gasoline for delivery in the Relevant Geographic Area of each focus case.	
III.B.2.(a) (iv) Each refiner will provide a history of ownership, during the relevant time period for each focus case listed in subparagraph (a) above, including changes in corporate structure, of each refinery it owns or has owned that serve the Relevant Geographic Area in each focus case.	Interrogatory #5 Identify each refinery you own or have owned that serves or served the Commonwealth of Puerto Rico. Interrogatory #6 For each refinery identified above, provide a history of ownership, including changes in corporate structure.
III.B.2.(a) (v) Each refiner will disclose the date it first blended MTBE and/or TBA into gasoline for deliveries to terminals that supplied the Relevant Geographical Area of each focus case.	Interrogatory #7 For each refinery identified above, disclose the date the refinery first blended MTBE and/or TBA into gasoline for deliveries to terminals that supply or supplied the Commonwealth of Puerto Rico.
III.B.2.(a) (vi) Each refiner shall describe the records, which include the name, contents and location of records, including electronically stored records, that record the batch number for batches of gasoline delivered from defendants' refineries to terminals in the Relevant Geographical Areas.	Interrogatory #8 For each refinery identified above, describe the documents and records which include the name, contents, and location of documents or records, including electronically stored records, that record the batch number for batches of gasoline delivered from each refinery to terminals in the Commonwealth of Puerto Rico.

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III.B.2.(a) (vii) For each petroleum product containing MTBE refined and/or marketed by the defendant into the Relevant Geographical Area of each focus case, the defendant shall disclose the name and grade (if applicable) of the product, the product and product code.	Interrogatory #9 Have you ever refined or marketed gasoline containing MTBE in or into the Commonwealth of Puerto Rico? If so, disclose the name and grade (if applicable) of the product, the product and product code.
III.B.2.(a) (viii) Each refiner will disclose the date it last blended MTBE and/or TBA into gasoline for deliveries into the Relevant Geographical Area of each focus case.	Interrogatory #10 Identify the date you last blended MTBE and/or TBA into gasoline for deliveries into the Commonwealth of Puerto Rico.
III.B.2.(a)(ix) Each defendant will respond to the seven categories identified by Judge Scheindlin in her Order to Marathon Ashland Petroleum, LLC, dated June 22, 2004, as that information pertains to the Relevant Geographic Area at issue in each focus case.	N/A
(1) All locations, by city and state, in the [Relevant Geographic Area], in which [defendant] directly sells or markets gasoline.	Interrogatory #1 Identify by address all locations in the Commonwealth of Puerto Rico where you sold or marketed gasoline. Specify if gasoline containing MTBE was sold or marketed at the locations and specify the nature of your business or financial relationship with the location
(2) All locations, by city and state, in the [Relevant Geographic Area], in which [defendant] owns or operates refineries.	Interrogatory #2 Identify by address the locations and ownership interests in stations, UST's, terminals, and refineries in which you have or had an interest, that are located in, or that serve, Puerto Rico. Specify the periods of time of such ownership.
(3) All routes in the [Relevant Geographic Area] along which [defendant] owns or operates gasoline pipelines, terminals, or other distribution facilities; indicate, by city and state, any and all primary origin points, secondary origin points, ending points, and breakout terminals along the routes. Depict this information in graphic format.	Interrogatory #11 Identify all routes in the Commonwealth of Puerto Rico along which you own (or have owned) or operate (or have operated) gasoline pipelines, terminals, or other distribution facilities and indicate by city any and all primary origin points, secondary origin points, ending points, and breakout terminals along the routes. Depict this information in graphic format.

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<p>(4) All routes in the [Relevant Geographic Area] along which [defendant] ships gasoline through a common carrier pipeline; indicate, by city and state, any and all primary and secondary origin points where [defendant] inputs gasoline, and any and all ending points, breakout terminals, and off-take points where [defendant] takes out gasoline. Depict this information in graphic format.</p>	<p>Interrogatory #12 Identify all routes in the Commonwealth of Puerto Rico along which you ship (or have shipped) gasoline through a common carrier pipeline, and indicate by city any and all primary and secondary origin points where you do input (or did input) gasoline, and any and all ending points, breakout terminals, and off-take points where you take out (or have taken out) gasoline. Depict this information in graphic format.</p>
<p>(5) All locations, by city and state, in the [Relevant Geographic Area], in which [defendant] owns or operates marine tankers, barges, and tank trucks that are used to transport gasoline.</p>	<p>Interrogatory #13 Identify all locations by city in the Commonwealth of Puerto Rico in which you own (or have owned) or operate (or have operated) marine tankers, barges, and tank trucks that are used to transport gasoline</p>
<p>(6) All waterway routes in the [Relevant Geographic Area] along which [defendant] transports gasoline; indicate, by city and state, the origin and ending points. Depict this information and the route in graphic format.</p>	<p>Interrogatory #14 Identify all waterway routes in the Commonwealth of Puerto Rico along which you transport (or have transported) gasoline, and indicate by city the origin and ending points. Depict this information in graphic format.</p>
<p>(7) All rail and road routes in the [Relevant Geographic Area] along which [defendant] transports gasoline. Indicate, by city and state, the origin points, ending points, and all delivery points along the route. Depict this information in graphic format.</p>	<p>Interrogatory #15 Identify all rail and road routes in the Commonwealth of Puerto Rico along which you transport (or have transported) gasoline, and indicate by city the origin points, ending points, and all delivery points along the route. Depict this information in graphic format.</p>